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August 19, 2022

Hon. Lewis J. Liman
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

Re: Letter Motion to Amend the Case Management Plan and Scheduling Order
Jada McGill & Angie Velez v. City of New York, et al., 21-cv-08619 (LJL)

Dear Judge Liman,

The parties jointly submit this cover letter to request a modification of the Case Management Plan and Scheduling Order. The parties request all forthcoming deadlines, including today's deadline for motions to amend or add parties, be extended by sixty (60) days. The parties' proposed deadlines are as follows:

- Motion to amend or add parties: Tuesday, October 18, 2022
- Completion of fact discovery: Monday, November 21, 2022
- Depositions completed by: Monday, November 21, 2022
- Requests for Admissions due: Thursday, October 20, 2022
- All expert discovery completed by: Friday, January 6, 2023
- All discovery completed by: Friday, January 6, 2023
- Proposed pretrial order submission: Monday, April 17, 2023
- Motion for summary judgment: Friday, January 20, 2023

The parties ask that that post-discovery status conference, currently scheduled for November 9, 2022, at 2pm, be rescheduled at the Court's convenience.

The parties have shown good cause for the requested extension. First, the parties have mutually agreed that additional time is needed for the exchange of information, including to identify prospective Doe Defendants, whose identity is not discernable through existing discovery.

Second, Defendants' counsel is experiencing staffing changes and a new lead attorney is expected to take over the matter on before or the beginning of September. Additional time will allow for further exchange of documents and facilitate information sharing, as well as allow new counsel to acquaint themselves with the matter. Moreover, this extension will not harm the parties' interests or cause undue delay.

The parties thank the Court for its consideration and are available to address any questions or concerns.

Respectfully submitted,

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